

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Application of California-American Water
Company (U210W) for Approval of the
Monterey Peninsula Water Supply Project and
Authorization to Recover All Present and Future
Costs in Rates.

A.12-04-019

(Filed April 23, 2012)

**RESPONSE BY WATER PLUS TO MOTION BY MCWD FOR RECIRCULATION OF
THE NOTICE OF AVAILABILITY OF THE COMMISSION'S DRAFT
ENVIRONMENTAL IMPACT REPORT**

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Date: June 24, 2015

I. INTRODUCTION

For all the reasons indicated by the Marina Coast Water District (“Marina Coast”), Water Plus supports its motion for recirculation of the Notice of Availability of the Draft Environmental Impact Report (“DEIR”).

These reasons generally involve the unavailability to the public of much supporting information needed to identify adverse environmental impacts of the project, as well as possible options for remediation of them..

Because of the lack of adequate data to support critical project assumptions, the project depends on a model to fill in the data gaps.. Although for this reason the validity of the model is critically important, the DEIR supplies only a single scatterplot to demonstrate model validity.

As a statistician, I need to see the Excel spreadsheet containing the data used to make that scatterplot. The DEIR does not provide those data. It should. Otherwise, in making its decision to certify the project as publicly convenient and necessary, the Commission would have to rely solely on the model-validity claims of hydrogeologists who are not statisticians.

II. CONCLUSION

The Commission should order the recirculation of the DEIR Notice of Availability while assuring its inclusion of the supporting data indicated as missing both here by Water Plus and in the motion by Marina Coast.

Dated June 24, 2015

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ron Weitzman". The signature is fluid and cursive, with the first name "Ron" being more prominent than the last name "Weitzman".

Ron Weitzman
President, Water Plus